

For Six Month Period Ending

13 MAY 1984

(Insert date)

Name of Registrant Prather Seeger Doolittle & Farmer Registration No. 1815

Business Address of Registrant 1101 Sixteenth Street, N.W.
Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1. n/a

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information: n/a

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?
 Yes ☐ No ☐ n/a

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
Therese M. Green	Associate	12/15/83

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

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8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information: n/a

Name of foreign principal

Date of Termination

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒* No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

*Empresa de Transporte Aereo del Peru ("AeroPeru")
Plaza San Martin No. 910-914, Apartado 1414
Lima, Peru

January, 1974*

*(see attachment)

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

The Government of the Federal Republic of Nigeria

The Royal Bank of Canada

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

The Government of the Federal Republic of Nigeria: General legal representation on economic and other matters arising under domestic and international law, including assessing trends in U.S. policies, identifying support for economic development in Nigeria, encouraging private investment and expansion of the markets for Nigerian exports.

The Royal Bank of Canada: General legal services; telephone and personal contacts with various officials from the Treasury Department on issues and concerns being raised in the area of U.S.-Canadian banking relations.

* AeroPeru: In addition to exempted activities, representatives of registrant discussed with various government officials the principal's position with respect to a dispute over reciprocity of services between the U.S. and Peru.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
 Yes ☒ * No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

*(see attachment)

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully. n/a

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
12/5/83	The Royal Bank of Canada	legal fees and expenses	\$ 6,735.94
12/14/83	The Government of the Federal Republic of Nigeria	legal fees and expenses	\$ 50,000.00
5/30/84	*Empresa de Transporte Aereo del Peru (AeroPeru)		\$ 7,787.53
Total			\$64,523.47

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☒ No ☐

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
The Government of the Federal Republic of Nigeria	11/28/83	one-way airline ticket from Washington, D.C. to Nigeria valued at \$1,712.00	Meeting with Nigerian Minister of Finance to advise him re strategy for negotiating standby agreement with the International Monetary Fund and the rescheduling of Nigerian private and public foreign debt.

³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(c).
⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS—MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
	The Government of the Federal Republic of Nigeria:	Messengers	\$ 316.40
	Reporting period	Telephone & tele-transmissions	2,123.17
		Business meals	117.06
		Intown travel & pkg	73.80
		Duplicating & publications	184.95
		Postage	5.45
		Travel	2,199.75
		Subtotal	\$ 5,020.58
	The Royal Bank of Canada:	Business meals	\$ 77.96
	Reporting period	Messengers	1,709.50
		Telephone & teletransmissions	500.50
		Postage	11.57
		Duplicating	311.15
		Intown travel & pkg	10.00
		Printing & publications	656.25
			\$ 3,276.93
	*AeroPeru:	Messengers & courier services	\$ 158.65
	3/21/84 - filing of this statement	Duplicating	197.80
		Postage	26.56
		Business meals	78.00
		Intown travel & pkg	21.00
		Telephone & teletransmissions	54.44
			\$ 536.45

Total \$ 8,833.96

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

n/a

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

n/a

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☒ *
 Exhibit B⁷ Yes ☐ No ☒ *

If no, please attach the required exhibit. *see attached

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

n/a

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C^a, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ n/a

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration state. . . and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)

Edwin H. Seeger
Edwin H. Seeger

Thomas L. Farmer
Thomas L. Farmer

Carl B. Nelson, Jr.
Carl B. Nelson, Jr.

Subscribed and sworn to before me at 1101- 16th St. West DC

this 5th day of July, 19 94

Ann A. Dorsch

(Signature of notary or other officer)

My Commission Expires May 31, 1986

^aThe Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

9. "Have you acquired any new foreign principal during this 6 month reporting period?" Yes.

Name and address of foreign principal:

Date acquired:

Empresa de Transporte Aereo del Peru ("AeroPeru") January, 1974
Plaza San Martin No. 910-914, Apartado 1414
Lima, Peru

*AeroPeru first became registrant's client in January 1974, however registrant's activities for AeroPeru through the reporting period ended November 13, 1974 were exempted by Section 3(g) of the Foreign Agents Registration Act (FARA). Registrant's supplemental statement for the reporting period ended May 13, 1975 reflected this fact and Exhibits A and B covering AeroPeru were then furnished. Registrant continued to list AeroPeru as a foreign principal in items 10 of each supplemental statement filed until 1982, at which time it was noted that between the reporting period ended May 13, 1976 and that ended May 13, 1982 (six years), registrant had engaged in no activities for, nor rendered any services to AeroPeru which were not exempt under the FARA. Accordingly, in the supplemental statement covering the reporting period ended May 13, 1982, registrant indicated in item 8 that connection with AeroPeru as a foreign principal ended May 1, 1982.

On May 21, 1984 registrant engaged anew in activities for AeroPeru which are required to be reported under the FARA. Accordingly, registrant attaches hereto in duplicate Exhibits A and B. Information provided in this Supplemental Statement relative to AeroPeru refers not to the reporting period ended May 13, 1984, but to activities (items 11 and 12) commenced on or since May 21, 1984. Receipts and disbursements in items 14 and 15 refer to the period beginning 60 days prior to commencement of these activities in accordance with section 2(a)(8) of the FARA.

12. "During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?" *Yes.

"If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter."

*Empresa de Transporte Aereo del Peru "AeroPeru"

On May 21, 1984, the registrant communicated AeroPeru's position on the reciprocity dispute by telephone to Carolyn Coldren, a staff member at the Civil Aeronautics Board (673-5096), to Donald Litton, chief of the CAB's Negotiations Division (673-5204), and to Richard Holwill in the office of the State Department's Assistant Secretary for Inter-American Affairs (632-9210).

The Government of the Federal Republic of Nigeria

On behalf of the Federal Republic of Nigeria registrant has corresponded, met and spoken with officials of the Departments of State, Commerce, and Justice, and the Federal Reserve System with regard to the conduct of negotiations with international financial agencies, commercial banks and the U.S. Department of the Treasury on the rescheduling of Nigerian public and private debt, and has assisted in arranging bilateral meetings between representatives of the U.S. and the Nigerian Governments. Registrant has also assisted in resolving certain claims against the Nigerian government for the recovery of monies by Pan American Airways, as follows:

U.S. Department of State:

Tom Smith, U.S. Ambassador-Designate to Nigeria, U.S. Department of State, re possible visit to Nigeria by official of the New York Federal Reserve Bank to assess Nigerian development efforts and visit to the U.S. by Nigerian Economic Minister, and regarding status of IMF debt rescheduling negotiations (12/6/83, 12/15/83, 12/16/83, 12/21/83, 1/6/84, 1/9/84, 1/30/84, 2/6/84, 2/7/84, 2/16/84, 3/1/84).

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Frank Wisner, Deputy Assistant Secretary of State for African Affairs, U.S. State Department, re visit by Nigerian Economic Minister and re general U.S. African policies (12/5/83, 12/30/83, 5/3/84).

Judy Johnson, Nigerian Desk Officer, U.S. Department of State, re visits by various officials of the Nigerian Government (12/6/83, 12/7/83, 12/8/83, 12/9/83, 12/16/83, 12/20/83, 12/21/83, 12/22/83, 12/27/83, 12/29/83, 1/31/84, 2/7/84, 2/8/84, 3/13/84, 3/21/84, 5/2/84, 5/8/84).

Don Gelber, Deputy Chief of Mission, American Embassy, Lagos, re debt rescheduling issues (12/2/83, 12/3/83).

Chester Norris, Economic Minister, American Embassy, Lagos, re debt rescheduling issues (12/2/83, 12/3/83, 12/6/83).

Thomas E. Williams, West African Affairs, U.S. Department of State, re visit by Nigerian Finance Minister and re Pan Am problem (2/1/84, 3/30/84).

U.S. Federal Reserve System:

Anthony Solomon, President, Federal Reserve Bank of New York, re visit by Solomon to Nigeria to assess development efforts (12/6/83, 12/14/83, 12/15/83, 12/17/83, 12/21/83, 12/27/83, 2/6/84, 2/17/84).

Paul A. Volcker, Chairman, Federal Reserve System, re Nigerian debt rescheduling (1/5/84, 1/11/84, 2/15/84).

Edwin Truman, Director, International Finance Division, Board of Governors, Federal Reserve System, re status of IMF negotiations and visit by Nigerian Finance Minister (1/27/84, 2/1/84, 4/24/84, 5/4/84).

U.S. Department of Commerce:

Lionel H. Olmer, Under Secretary for International Trade, U.S. Department of Commerce, re Nigerian development efforts (12/30/83).

International Monetary Fund:

Richard Erb, U.S. Executive Director, International Monetary Fund, re IMF negotiations (12/30/83).

12. (Cont'd): page 3 of 3

U.S. Department of Justice:

William A. Webster, Director, Federal Bureau of Investigation,
U.S. Department of Justice, re possible meeting with senior
Nigerian officials (2/15/84).

The Royal Bank of Canada

On behalf of Royal Bank, we have sought to keep in contact with
U.S. officials involved in U.S./Canadian banking relations. These
contacts included the following:

U.S. Department of the Treasury:

James Ammerman, Director, Office of International Banking &
Portfolio Investment, U.S. Department of the Treasury, calls
and conferences regarding intergovernmental negotiations to
improve procedures of mutual assistance between the U.S. and
Canada relative to the release of documents from bank secrecy
jurisdictions, also regarding Canadian parliamentary debate on
bank act legislation and U.S. congressional hearings on
reciprocity (11/16/83, 11/21/83, 12/6/83, 12/8/83, 3/27/84).

U.S. Department of Justice:

Timothy J. Finn, Associate Deputy Attorney General, U.S.
Department of Justice, discussion regarding intergovernmental
negotiations on bank records problem (12/8/83).

Congress:

Lamar Smith, Chief Economist, Staff, Senate Committee on
Banking, Housing & Urban Affairs, discussion regarding hearings
on Senator Garn's proposed legislation on banking reciprocity
(12/21/83).